REMARKS

By the amendments listed above, Claims 46, 54-55, 61, 69-70, and 76 have been amended. Claims 52-53 and 67-68 have been canceled. Claims 46-51, 54-66, and 69-76 are currently pending in this application. The Applicants respectfully assert that no new matter has been added, and examination of each claim is respectfully solicited. For the reasons stated below, the Applicants respectfully assert that the application should be allowed.

Claim Rejections Under 35 U.S.C. § 102(e)

According to the Office Action mailed on April 5, 2007, Claims 46-76 have been rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,311,170 to Embrey ("*Embrey*"). As disclosed in *Embrey*, a service provider makes payments, on behalf of the plurality of payor entities, to a plurality of payee entities where a trusted intermediary financial institution periodically receives payment information and payment authorization from the plurality of payor entities. (*See Embrey*, Abstract). The trusted intermediary financial institution automatically transfers funds to the service provider in amounts consistent with payment information that includes (1) an identification of each of the plurality of payee entities; (2) an identification of payment amounts for each of the plurality of payee entities; (3) a payment record identifier (also referred to as a "virtual check number") which is uniquely associated with each payment; and (4) a character string, known as an "authorization code", which is uniquely associated with each payment record identifier. (*See Embrey*, Abstract; Col. 3, lines 10-33; Col. 8, lines 43-59).

However, the Applicants respectfully assert that *Embrey* does not anticipate all of the claim elements of amended independent Claim 46. Specifically, *Embrey* fails to teach and/or suggest all of the recitations of amended independent Claim 46 including:

> selecting at least one alteration rule associated with the payee;
> altering the consumer account number to a modified consumer account number
> based on the at least one alteration rule associated with the payee, and wherein
> altering the consumer account number to a modified consumer account number
> includes inserting a character string at a particular position in the consumer
> account number to create the modified consumer account number

According to the Applicants' specification, such functionality (1) corrects unintentional errors that occur when a payor (or administrator) enters an account number associated with the payee during the submission of a payment transaction, and/or (2) ensures that the proper account number formatting is used to allow a payee's system to process the submitted payment. (*See Garrison et al.*, paragraphs 0052-0056).

An example of the alteration of a submitted account number by inserting a character string according to an alteration rule associated with the payee as described in amended independent Claim 46 is provided in the specification:

> Once the account number has been validated, it is then modified in step 46 so as to conform to alteration rules 44 for the applicable merchant. The alteration rules 44 are also stored in database 18. The alteration rules 44 relate to the format of the consumer's account number in which the applicable merchant system requires to process a consumer's payment . . . . Alteration by the RPP 3 involves [modifying] the received account number which will be furnished, along with payment, to the merchant. For instance, some merchant systems require that the consumer's account number always end in "120". Hence, in such a case, the RPP 3, in accordance with programmed instructions stored on the memory 16, modifies the received account number to append "120" to the end of the alpha-numeric sequence of the received account number. Once the account number has been modified so as to conform to the format required by the merchant system, the altered account number 47 is then transmitted from the RPP 3 to the merchant 4 via the network 1, along with the payment, in step 48.

(*Garrison et al.*, paragraph 56). Such functionality is not taught or suggested by *Embrey*.

Therefore, the Applicants respectfully assert that amended independent Claim 46 is not anticipated by *Embrey* and is in condition for allowance. The Applicants further respectfully assert that amended independent Claims 61 and 76 are also in condition for allowance for at least the same reasons as amended independent Claim 46. Additionally, each of the pending dependent claims are allowable as a matter of law as being dependent on allowable base claims, notwithstanding the independent recitation of patentable subject matter that may be described in one or more of the dependent claims.
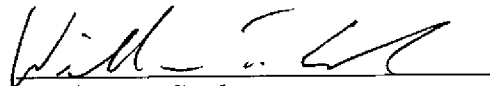
For at least the above stated reasons, *Embrey* does not anticipate any of the pending claims. Therefore, allowance of the pending claims is respectfully solicited.

CONCLUSION

The Applicants believe they have responded to each matter raised by the Examiner. Allowance of the claims is respectfully solicited. It is not believed that extensions of time or fees for addition of claims are required beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR §1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 19-5029.

Respectfully submitted,

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